

Data Submitted (UTC 11): 11/24/2023 8:38:13 PM

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Comments: As a resident of Colorado and an enthusiastic "peakbagger" who frequently utilizes the Blue Lakes trail to access nearby peaks, I would like to express some safety-related concerns regarding the potential impacts of the proposed permitting system.

The provided "Quick Facts" and "Frequently Asked Questions" PDFs supplied by the Forest Service for this project indicate the implementation of a permitting system, restricting user access from May 1 to September 30, starting no earlier than 2025. However, there is a lack of detailed information on how this permitting system will operate, particularly regarding the release dates for permits. With the Forest Service estimating a demand that may exceed availability by up to 750%, it is reasonable to anticipate very high competition for permits on the Blue Lakes trail.

Given the expected high demand, users are likely to face very high competition for permits as soon as they become available, regardless of how far in advance that might be. If the Forest Service adopts a similar approach as seen in other reservation systems, releasing all permits for a specific date several months beforehand, it poses an undue risk on permit users. Permit dates being significantly ahead of the intended visit provide no reasonable way for users to assess environmental conditions on the actual day of their visit, especially in high-altitude hiking or climbing scenarios.

The consequence of high demand for permits is a user culture that recognizes the value of a permit as a scarce commodity. Consequently, individuals may modify their decision-making process, starting with the understanding that their permitted date might be their only chance to visit the desired area for several years. This alteration often leads to a higher threshold of risk tolerance concerning environmental conditions, particularly for those pursuing specific goals like hiking or climbing nearby summits.

Drawing from personal experience, having summited over 250 different 13,000' peaks in Colorado, I've encountered challenges securing permits for peaks like "Thunder Pyramid" in the Maroon Bells region. Since the current permitting system was implemented in the Maroon Bells area, I have tried on over a dozen occasions to secure a parking permit to access the trail I need to take to reach this summit. However, I've failed each time. As I get closer to reaching my goal, I've realized that my only viable option to secure a permit to access this peak, other than great luck, is to choose dates I would not normally climb-either early season or late season. This places me in a position I'm less prepared for and less familiar with, thus increasing my risk.

Another example involves a family trip to the North Rim of the Grand Canyon, where obtaining a permit took multiple attempts over several years. This trip coincided with a large fire that had recently broken out in the area we were unaware of at the time of our departure. The area of forest we needed to access involved taking a graded 2WD dirt road to the rim where we were to begin our hike that lay just outside of the closure area due to the fire. On our drive in, it was obvious that fire crews had been moving large equipment down the road, creating conditions our vehicle was ill equipped to handle due to large mud pits that had formed as the equipment moved through zones where water had been air dropped on the nearby fire. We also encountered several small hot spots on our drive in near unburnt timber. In addition, the forecast for the week of our visit included a high potential for flash flooding. I recall in vivid detail discussing whether it was wise to continue. At the root of each decision we made however, was the base understanding that we would not be likely to receive another opportunity to visit the area for several years, so we pressed on, despite the added risk. The result was a trip that cost us several thousand dollars in damages to our vehicle and getting caught in one of the forecasted flash floods, which we narrowly escaped. Had the permitting system not been in place, we would have been far more likely to simply turn around with the knowledge we could just return later. However, the limited availability of

access fundamentally altered our decision-making, compelling us to proceed despite the heightened risks, resulting in significant damages to our vehicle and a narrow escape from a flash flood. This could have easily resulted in an emergency extraction situation had we not been prepared with gear we were able to rig to assist in crossing swollen streams, treat dirty water, and a second recovery vehicle to aid our damaged one.

Without careful consideration of how the permitting system influences user decision-making, the Forest Service may inadvertently increase the level of risk users must assume when accessing Blue Lakes. This is particularly concerning for those aiming to climb lesser-known alpine summits like Gilpin Peak, Dallas Peak, T0, S4, S5, S6, and others via the Blue Lakes trail. The proposed permitting system, if structured to release all permits at once months ahead, may amplify the risk for climbers, forcing them to select dates too far in advance to assess weather and snow conditions adequately.

In addition to the added risk, the intense competition for permits often leads users to employ various tactics to secure reservations, such as creating scripts to automate bookings, using third-party monitoring services, collaborating with larger groups to book simultaneously, and booking consecutive days without intent to use them.

To address these concerns, I propose that the Forest Service consider the following suggestions when releasing permits:

1. Reserve a portion of permits to be released within a short window, perhaps 5-7 days prior to the permit use date, allowing users to better prepare for weather conditions and reducing the incentive to assume unnecessary risks.
2. Release permits at staggered or random times to make it harder for dedicated users to exploit the system.
3. Explore the possibility of technology-enabled permit activation upon arrival, with penalties for unused permits. This approach would encourage responsible permit usage and prompt users to release permits they do not intend to use.

I appreciate your consideration of these comments.